DECISION NOTICE/FINDING OF NO SIGNIFICANT IMPACT

ANGELES NATIONAL FOREST and
SAN GABRIEL MOUNTAINS NATIONAL MONUMENT
PLAN FOR INVASIVE PLANTS

U.S. FOREST SERVICE
Los Angeles and San Bernardino Counties, California

DECISION

Based upon my review of the Plan for Invasive Plants Project Environmental Assessment (EA), I have decided to implement Alternative 2, the Proposed Action which includes the eradication, control, containment, or suppression of existing and new infestations of invasive plant species that are undesirable, noxious, harmful, injurious, or poisonous. This Decision Notice/Finding of No Significant Impact covers all areas in the project except wilderness and Research Natural Areas. San Gabriel, Cucamonga, Sheep Mountain, Pleasant View Ridge and Magic Mountain Wildernesses and Falls Canyon Research Natural Area are not covered under this Decision Notice/Finding of No Significant Impact.

All proposed treatment methods including mechanical, manual, fire wilting, and herbicide, will be used. The specific herbicides included for use in this decision are listed in the EA (pg. 14). I am allowing the use of special chemicals called surfactants or adjuvants, which will increase the effectiveness of herbicides.

The project incorporates an adaptive management strategy that allows the project to be modified based on invasive plant expansion or new infestations of invasive plants. Prescriptions for treatment will follow integrated weed management, using site specific factors to find the treatment or combination of treatments that is most effective for each site. Monitoring and restoration are also key components of the proposed action. All monitoring data will be compiled through Forest Service Activity Tracking System (FACTS) and National Resource Information System (NRIS) corporate databases. Restoration activities will occur where needed to ensure treated areas are not re-colonized with invasive plant species. The EA summarizes and incorporates by reference a Monitoring Plan, and a Restoration Plan, and I am adopting the FY 2015 versions of each of these documents as part of my decision.

All the design features for the Proposed Action described in the EA will be implemented. Treatment may also occur on adjacent non-FS lands if landowners or managers wish to enter into participating agreements with the Forest Service. The annual treatment within the project area will not exceed 3000 acres.

DECISION RATIONALE

Invasive species are widely recognized by federal, state, and local governments, a variety of environmental and conservation groups and the scientific community as a primary threat to ecosystem health and function (EA pp. 4-5). Based on the Environmental Assessment, Alternative 2 best meets the purposes of and needs for the project while minimizing adverse effects to the environment. I based my conclusion on a review of the analysis showing the use of best available science. I selected Alternative 2 because it provides a variety of management tools to counteract the persistent and growing threats posed by invasive species.

Mechanical methods, without the use of herbicides, was analyzed and considered (Alternative 3). This alternative was not selected because it doesn't meet the purpose and need. Manual removal (no herbicide use) would have resulted in less efficiency, lower treatment acreages annually, and higher costs. While it is possible to contain and control spread of some invasive species using only manual or mechanical methods, several of the most damaging invasive species are known to persist and expand when treated

mechanically. Invasive species management is more feasible with herbicides in conjunction with other techniques, as in an integrated weed management system. A No Action Alternative was also considered. It would allow invasive species to continue to expand and spread both on and off NFS lands, which would not meet the project's purpose and need (EA, pp. 43).

Alternative 2 allows for and encourages cooperation with state and county agencies and private landowners in managing invasive plants on non-NFS lands, including treatments where authorized by agreement (EA, pg. 5).

Dense stands of tamarisk and arundo can reduce streamflow by direct water usage and can affect stream morphology by unnaturally stabilizing stream banks, islands, sandbars and floodplains. Tamarisk can increase salt buildup in soils, reducing soil productivity (EA, pg. 60). Treatment of invasive plants located in riparian habitat will improve aquatic habitat conditions and overall quality and quantity of water by eradicating or controlling these quick invaders from stream areas.

Treating invasive species, particularly those with potential to alter fire regimes, will also reduce the risk of increased fire severity and frequency of damaging fires in these drainages (EA, pg. 39).

I am making this decision with full recognition of the impacts and risks of using chemical herbicides. Alternative 2 will use an integrated weed management approach in which herbicide use is an option but is not intended to be the only or even the primary treatment for all invasive plants. The six herbicides I am allowing under Alternative 2 are approved for use by the Environmental Protection Agency (EPA), are the subject of detailed human health and ecological risk assessments, and are the safest chemicals that will accomplish the project's objectives. My decision does not allow broadcast spraying of any herbicides.

Numerous design features are incorporated into the alternative to manage impacts to populations of threatened, endangered, and Forest Service sensitive plant and wildlife species. Other design features are included to minimize impacts to the native riparian vegetation and provide for health and safety to humans (EA, pp. 19-32). I have determined that short term risks to wildlife, native plants, and human health and safety are effectively mitigated by the adoption of a thorough list of design features, and are outweighed by many long term benefits of aggressively treating invasive species with an integrated approach using a variety of treatment methods.

Based on the project including numerous design features, adverse impacts to resources have been managed. The Invasive Plant Treatment Project EA documents the environmental analysis and conclusions upon which this decision is based.

PUBLIC AND AGENCY INVOLVEMENT

This action was originally listed as a proposal on the Angeles National Forest (ANF) Schedule of Proposed Actions on April 1, 2015 and updated periodically during the analysis. A postcard was mailed to over 1000 interested parties on April 20, 2015 inviting their review on the draft EA and comments on the scope of the proposal. A legal notice was published in the LA Times Newspaper on April 22, 2015. Information about the project was also posted to the ANF Website under the SOPA category. The Team Leader responded to over 20 individual e-mails and phone calls during the scoping period.

A legal notice was published on April 22 in the LA Times Newspaper, starting the official 30-day public comment period required by 36 CFR 218. The Team Leader again responded promptly to several e-mail inquiries during this comment period. Throughout the entire process, the ID Team communicated with several key regulatory, partner, and otherwise interested public agencies (EA, pg. 74).

The Forest Service has documented, analyzed, and responded to the public comments received during the scoping and comment periods for the Plan for Invasive Plants EA.

Appendix A summarizes the comments received during the scoping/comment periods and provides the agency's response to those comments. I have reviewed and considered all public and agency viewpoints submitted. On the whole, the record reflects a strong support for the project's objectives and methods, with concerns over adverse impacts addressed through the application of design features.

FINDING OF NO SIGNIFICANT IMPACT

I have considered the significance of environmental impacts in terms of context and intensity. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human and national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. In the case of a site-specific action, significance usually depends upon the effects in the locale rather than in the world as a whole. Intensity refers to the severity or degree of impact (40 CFR 1508.27). The EA addresses the elements of significance in detail (EA pp. 69-74). I have reviewed these elements, and my consideration of them is summarized here.

CONTEXT

This project is located throughout the Angeles National Forest and San Gabriel Mountains National Monument. This Forest is an urban forest with large population centers nearby (e.g. Los Angeles). This project covers approximately 375,820 acres. The proposed action will provide long term benefits and will not have a significant adverse effect to society locally or regionally, short-term or long-term.

INTENSITY

The intensity of effects was considered in terms of the following:

1. **Impacts may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that, on balance, the effect will be beneficial.**

   Consideration of the intensity of environmental effects is not biased by beneficial effects of the action. Chapter 3 of the EA is the analysis of effects (pp. 37-74).

2. **The degree to which the proposed action affects public health or safety.**

   One of the objectives for this project is to provide for health and safety during implementation of the project. As noted in the human health and safety section in Chapter 3 of the EA, health and safety are broken into three main groups: fire and fuels, non-herbicide activities and herbicide use. Greatest risk to humans is from the use of triclopyr 3A. Design features are included in the proposed action to reduce potential health and safety risks from the use of this herbicide along with other potential health and safety risks from the implementation of this project. Based on the proposed action, including the design features, there will be no significant effects on public health and safety.

3. **Unique characteristics of the geographic area, such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.**

   There are special designations within the project area, including Big Tujunga Canyon Treasured Landscape and Critical Biological Land Use Zones designated in the Land Management Plan. The objectives of the project complement and enhance each of these unique areas. Many special historic or cultural resources also occur within the project area, they will be protected through the application of design features (EA, pg. 31). Consultation with the State Historic Preservation Office occurred, and the design features reflect their recommendations. There will be no significant effects to any unique characteristics of the project area.

4. **The degree to which the effects on the quality of the human environment are likely to be highly controversial.**

   A majority of the comments were in favor of the project and agreed with its objectives. The EA adequately analyzes the risks of herbicide to humans and makes comparisons to an alternative that would not use them. Based on the overall analysis in the EA and the public involvement, the effects of the proposed action are not likely to be highly controversial.

5. **The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.**

   The Forest Service has considerable experience with actions like the one proposed. The EA, the analysis for herbicide use focused on the detailed national risk assessments and potential effects are noted in Chapter 3 of the EA. Because all six herbicides have been approved by EPA and are certified for use by the State, it is unlikely the risks are highly uncertain or involve unknown risk. In addition, numerous design features have been incorporated into Alternative 2 to reduce potential risks to the environment caused by the use of herbicides. The analysis shows the effects are not uncertain, and do not involve unique or unknown risk.

6. **The degree to which the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.**

   Alternative 2 is project-specific and does not establish a precedent for future actions with significant effects. Any future actions not covered by this proposal would need to consider all relevant scientific, site-specific information available at that time, and an independent environmental analysis of environmental consequences. The project does not involve future connected actions.

7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.**

   Based on the cumulative effects analysis addressed for each resource, there would be no significant cumulative effects. The analysis determined that Alternative 2, when combined with other actions in the project area, would likely have beneficial cumulative effects related to reducing the spread of invasive plants. This would result from either expanding the capacity of other actions for control and eradication or by mitigating their potential for increasing invasive plant distribution and abundance in the project area.

8. **The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed, or eligible for listing, in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.**

   As noted in the third intensity factor above, Alternative 2, including the implementation of the heritage resource design features, is not expected to have direct or indirect adverse effects to cultural resource sites. By implementing the design features, which include pre-treatment surveying in areas and projects with potential effects, flag and avoidance, and monitoring protection measures effectiveness, Alternative 2 would have a less than significant effect to cultural and historic resources.

9. **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of**

The project area is occupied by or has habitat for twelve threatened or endangered species: Nevin's Barberry, slender-horned spineflower, thread-leaved Brodiaea, Braunton's milk-vetch, California condor, southwestern willow flycatcher, least Bell's vireo, coastal California gnatcatcher, arroyo toad, mountain yellow-legged frog, California red-legged frog and Santa Ana sucker. Critical habitat for the mountain yellow-legged frog, arroyo toad, Santa Ana sucker, southwestern willow flycatcher and coastal California gnatcatcher is also present. There are many design features to minimize impact to federally listed plant and wildlife species (e.g. pre-treatment surveys; restriction on herbicide use near known populations; possibly flag and avoid, seasonal restrictions; monitor where treatments occur near listed plant populations). Based on the EA, the impacts from Alternative 2 would be beneficial in the long run by countering threats invasive species pose to listed wildlife habitats. A Biological Assessment was submitted to the U.S. Fish and Wildlife Service (FWS) with a request to initiate consultation. On 11/17/2015 we received the letter of concurrence for federally endangered Braunton's milk-vetch (Astragalus brauntonii), Nevin's barberry (Berberis nevinii), slender-horned spineflower (Dodecahema leptoceras), southwestern willow flycatcher (Empidonax troillii extimus), least Bell's vireo (Vireo bellii pusillus), and mountain yellow-legged frog (Rana muscoso), the federally threatened thread-leaved brodiaea (Brodiaea filifolia), Santa Ana sucker (Catostomus santaanae), California red-legged frog, (Rona droytonii) (R. aurora d.), coastal California gnatcatcher (Polioptila californica californica). We have not yet received a biological opinion for the federally endangered arroyo toad [Anaryrus colifornicus (Bufo microscaphus c.)]. Work will not begin in occupied or critical habitat for the arroyo toad until we receive the biological opinion.

10. **Whether the action threatens to violate Federal, State, or local law or requirements imposed for the protection of the environment.**

The action will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA and the action is consistent with the Angeles National Forest Land Management Plan (LMP). The EA contains a thorough review of all applicable goals, desired conditions, strategies and standards, and the design features represent consistency with all these LMP components.

After considering the effects of the actions analyzed, in terms of context and intensity, I have determined these actions will not have a significant effect on the quality of the human environment. Therefore, an environmental impact statement will not be prepared.

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

As noted above, this decision is consistent with LMP s required by the National Forest Management Act and does not violate Federal, State or local laws and regulations. Discussions of the various key laws and regulations and how the project complies with them are located on pages 4-5 of the EA.

Administrative Review Opportunities

This decision was subject to the pre-decisional objection process described in 36 CFR 218, Subparts A and B. The objection process allows those who have submitted substantive comments during an official comment period to request review of my decision by the Pacific Southwest Regional Office.

An objection period began on September 8, 2015 with the publication of a legal notice in the Los Angeles Times. Prior to the legal notice individuals were contacted who had submitted comments on the project, notifying them of the opportunity to file an objection. The period to file objections was 45

days, as specified in regulation, and ended on October 23, 2015. No objections were received.

Implementation Date

Implementation of this decision may occur on, but not before, the 5th business day following the close of the objection filing period.

Contact:

For additional information concerning this decision, contact:
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12/02/15
Date